

# Financial Responsibility Demonstration Crosswalk

## Contents

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DRAFT

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## Evaluate Information about the Financial Responsibility Demonstration of the Proposed GS Site

40 CFR 146.85; Implementation Manual Section 4; Geologic Sequestration of Carbon Dioxide: Underground Injection Control (UIC) Program Class VI Well Financial Responsibility Guidance.

This Crosswalk includes information from the Title 40 Code of Federal Regulations (CFR) and generally follows the layout of the Geologic Sequestration Data Tool (GSDT) and narrative templates, with additional information pulled from the Sequestration Guidance documents available on EPA's national UIC program website.

If you have uploaded a file to the GSDT the name will be captured in the system, as will all the filled-in or selected options. They can be downloaded by the permit reviewers as pdfs.

### Narratives

Narratives cover the range of information desired and leave the final organization to the applicant's preference. The Crosswalk does not replace the Template but may add items to consider. Where there are similar questions repeated in different sections of the Template, the Crosswalk attempts to put those in a preliminary discussion at the front of the document in a generic format (i.e. each subsection will have a slightly different focus to reduce repetition).

### Documents

To keep document size manageable and provide all the information in a usable format, it would be useful to create a separate file or files for the different types of information. If the GSDT upload option does not allow multiple files or overwrites the first one, zip the files together prior to uploading.

The Project Information Crosswalk discusses file format, styles, sizes, and types of supporting documentation requests under *Formatting and Other Data Expectations*.

### Referencing Other Submissions

Note that a number of discussions are included under multiple headings and different modules. To avoid errors and duplication, please do NOT submit the detailed information twice. Include the appropriate synthesis in the section discusses and reference materials submitted as part of the permit application, via the AoR delineation modeling input advisor, etc., but references should be specific (e.g., "Computational modeling results - see permit application Section 1, pages 2 through 5 and Figures 1.7 through 1.12, as submitted 1/1/14."). Referenced materials should explicitly address the selected requirements. If using an uploaded file, include the file name as well.

## Financial Responsibility Demonstration

Table [ SEQ Table \\* ARABIC ]: Cost Estimates

Information	CFR and Guidance	Location & File: GSDT or CBI?
Cost Estimates	40 CFR 146.85(c) LAC: §3609.C.4.h	
1. 3 <sup>rd</sup> party company providing estimates		
a. Cost and Date for the 4 phases.		
2. Year of dollars -?		
Cost Estimate File		
1. Cost estimates and all supporting documents (zip)		
Additional Cost Information		
1. Additional documents for primacy state needs		
Description of information submitted		
1. Summary of information in files		

Table [ SEQ Table \\* ARABIC ]: Trust Fund

Information	CFR and Guidance	Location & File: GSDT or CBI?
Trust Fund Details	LAC: §3609.C.1.d	
1. Number of Instruments (enter details for each)		
Proof of Third-Party Financial Strength		
1. Credit ratings used		
a. Name of issuing Institution		
b. Credit Rating		
c. Rating Date		
d. Company Issuing Rating		
2. Credit ratings not used		
a. Describe proof		
Trust Fund Number		
1. Enter number		
2. Date Instrument Issued or amended		
3. Date Instrument expires		
Phases Covered by Instrument		
1. Corrective Action on Deficient wells		
2. Plugged Injection Well		

3. Post-Injection Site Care and Site Closure		
4. Emergency and Remedial Response		
More than one instrument for a single phase		
1. No		
2. Yes: value		
Is a pay-in-period in use		
1. No		
2. Yes: Number of payments (for each)		
a. Value		
b. Date planned		
c. Date deposit make		
Instrument Language (Trust Agreement Template)		
1. Used recommended template language?		
a. Yes		
b. No: includes required conditions coverage: y/n		
2. (Upload) instruments (zip)		

Table | SEQ Table \\* ARABIC |: Surety Bond

Information	CFR and Guidance	Location & File: GSDT or CBI?
Surety Bond Details	LAC: §3609.C.1.b	
1. Number of bond instruments (fill in for each)		
Proof of Third-Party Financial Strength		
1. Credit ratings used		
a. Name of issuing Institution		
b. Credit Rating		
c. Rating Date		
d. Company Issuing Rating		
2. Credit ratings not used		
3. Describe proof		
Security Bond Number		
1. Enter number		
2. Date Instrument Issued or amended		
3. Date Instrument expires		
Type of Bond		
1. Performance Bond		

Information	CFR and Guidance	Location & File: GSDT or CBI?
2. Financial Guarantee		
Phases Covered by Instrument		
1. Corrective Action on Deficient wells		
2. Plugged Injection Well		
3. Post-Injection Site Care and Site Closure		
4. Emergency and Remedial Response		
More than one instrument for a single phase		
1. No		
2. Yes: value		
Is a pay-in-period in use		
1. No		
2. Yes: Number of payments (for each)		
a. Value		
b. Date planned		
c. Date deposit make		
Instrument Language (Trust Agreement Template)		
1. Used recommended template language?		
a. Yes		
b. No: includes required conditions coverage: y/n		
2. (Upload) instruments (zip)		
Standby Trust		
1. Not created		
2. Created		
a. Issuing Institution		
b. Value		
c. Date issued or amended		
d. Date expires		
Instruments		
1. (Upload) instruments (zip)		

Table | SEQ Table \\* ARABIC |: Letter of Credit

Information	CFR and Guidance	Location & File: GSDT or CBI?
Letter of Credit Details	LAC: §3609.C.1.c	

Information	CFR and Guidance	Location & File: GSDT or CBI?
1. Number of instruments (fill out for each one)		
Proof of Third-Party Financial Strength		
1. Credit ratings used		
a. Name of issuing Institution		
b. Credit Rating		
c. Rating Date		
d. Company Issuing Rating		
2. Credit ratings not used		
3. Describe proof		
Letter of Credit Number		
1. Enter number		
2. Date Instrument Issued or amended		
3. Date Instrument expires		
Phases Covered by Instrument		
1. Corrective Action on Deficient wells		
2. Plugged Injection Well		
3. Post-Injection Site Care and Site Closure		
4. Emergency and Remedial Response		
More than one instrument for a single phase		
1. No		
2. Yes: value		
Is a pay-in-period in use		
1. No		
2. Yes: Number of payments (for each)		
a. Value		
b. Date planned		
c. Date deposit make		
Instrument Language (Trust Agreement Template)		
1. Used recommended template language?		
a. Yes		
b. No: includes required conditions coverage: y/n		
2. (Upload) instruments (zip)		
Standby Trust		
1. Not created		

Information	CFR and Guidance	Location & File: GSDT or CBI?
2. Created		
a. Issuing Institution		
b. Value		
c. Date issued or amended		
3. Date expires		
Instruments		
1. (Upload) instruments (zip)		

**Table [ SEQ Table \\* ARABIC ]: Third Party Insurance**

Information	CFR and Guidance	Location & File: GSDT or CBI?
Third Party Insurance Details	LAC: §3609.C.1 & C.2; details; Third party insurance will not be accepted as a form of financial surety	
1. Number of instruments (fill out for each one)		
Proof of Third-Party Financial Strength		
1. Credit ratings used		
a. Name of issuing Institution		
b. Credit Rating		
c. Rating Date		
d. Company Issuing Rating		
2. Credit ratings not used		
3. Describe proof		
Policy Details		
1. Date Policy active with description		
2. Date policy expires with description		
Phases Covered by Instrument		
1. Corrective Action on Deficient wells		
2. Plugged Injection Well		
3. Post-Injection Site Care and Site Closure		
4. Emergency and Remedial Response		
More than one instrument for a single phase		
1. No		
2. Yes: value		
Is a pay-in-period in use		

Information	CFR and Guidance	Location & File: GSDT or CBI?
1. No		
2. Yes: Number of payments (for each)		
a. Value		
b. Date planned		
3. Date deposit make		
Instrument Language (Trust Agreement Template)		
1. Used recommended template language?		
a. Yes		
b. No: includes required conditions coverage: y/n		
2. (Upload) instruments (zip)		

Table [ SEQ Table \\* ARABIC ]: Escrow Account

Information	CFR and Guidance	Location & File: GSDT or CBI?
Escrow Account Details	LAC: §3609.C.1 & C.2: details; Escrow will not be an accepted form of financial assurance	
1. Number of instruments (fill out for each one)		
Proof of Third-Party Financial Strength		
1. Credit ratings used		
a. Name of issuing Institution		
b. Credit Rating		
c. Rating Date		
d. Company Issuing Rating		
2. Credit ratings not used		
3. Describe proof		
Escrow Account Number		
1. Enter number		
2. Date Instrument Issued or amended		
3. Date Instrument expires		
Phases Covered by Instrument		
1. Corrective Action on Deficient wells		
2. Plugged Injection Well		
3. Post-Injection Site Care and Site Closure		

Information	CFR and Guidance	Location & File: GSDT or CBI?
4. Emergency and Remedial Response		
More than one instrument for a single phase		
1. No		
2. Yes: value		
Is a pay-in-period in use		
1. No		
2. Yes: Number of payments (for each)		
a. Value		
b. Date planned		
3. Date deposit make		
Instrument Language (Trust Agreement Template)		
1. Used recommended template language?		
a. Yes		
b. No: includes required conditions coverage: y/n		
Standby Trust		
1. Not created		
2. Created		
a. Issuing Institution		
b. Value		
c. Date issued or amended		
3. Date expires		
Instruments		
1. (Upload) instruments (zip)		

Table [ SEQ Table \\* ARABIC ]: Self Insurance

Information	CFR and Guidance	Location & File: GSDT or CBI?
Self-Insurance Details	LAC: §3609.C.1 & C.2: details; Self-insurance will not be an accepted form of financial assurance	
1. Yes: Corporate guarantee		
a. Parent Company Name		
b. Parent owns % Subsidiary Stock		
c. Years in business		

Information	CFR and Guidance	Location & File: GSDT or CBI?
2. Supporting Documentation		
a. Audited Financial statements; submitted date		
b. Auditor's special report; submitted date		
Phases Covered by Instrument		
1. Corrective Action on Deficient wells		
2. Plugged Injection Well		
3. Post-Injection Site Care and Site Closure		
4. Emergency and Remedial Response		
More than one instrument for a single phase		
1. No		
2. Yes: value		
Total Liability		
1. Cost covered GS phases		
2. Sum Company's financial responsibilities currently met (financial test; Corporate guarantee; inc. CERCLA and RCRA)		
Financial Coverage Criteria		
1. Passes (A) coverage criteria & either (B) Financial Ratio Test or (C) Bond Rating Test		
(A) coverage criteria		
1. Net working capital		
2. Tangible Net Worth		
3. Total Assets		
4. Domestic Assets		
(B) Financial Ratio Test		
1. Debt-Equity Ratio		
2. Asset-Liability Ratio		
3. Cash Return on Liabilities Ratio		
4. Liquidity		
5. Net Profit		
(C) Bond Rating Test		
1. Name of Company		
2. Bond Rating		
3. Rating Date		

Information	CFR and Guidance	Location & File: GSDT or CBI?
4. Company Issuing Rating		
Instrument Language (Trust Agreement Template)		
1. Used recommended template language?		
2. Yes		
3. No: includes required conditions coverage: y/n		
4. (Upload) instruments (zip)		

Table [ SEQ Table \\* ARABIC ]: Other Instrument

Information	CFR and Guidance	Location & File: GSDT or CBI?
Other Instrument Details	LAC: §3609.C.1.e	
1. Number of instruments (fill out for each one)		
Proof of Third-Party Financial Strength		
1. Credit ratings used		
a. Name of issuing Institution		
b. Credit Rating		
c. Rating Date		
d. Company Issuing Rating		
2. Credit ratings not used		
3. Describe proof		
Bank Assigned Instrument Number		
1. Enter number		
2. Date Instrument Issued or amended		
3. Date Instrument expires		
Phases Covered by Instrument		
1. Corrective Action on Deficient wells		
2. Plugged Injection Well		
3. Post-Injection Site Care and Site Closure		
4. Emergency and Remedial Response		
More than one instrument for a single phase		
1. No		
2. Yes: value		
Instrument Language (Trust Agreement Template)		

Information	CFR and Guidance	Location & File: GSDT or CBI?
1. Includes required conditions coverage: y/n		
Standby Trust		
1. Not created		
2. Created		
a. Issuing Institution		
b. Value		
c. Date issued or amended		
3. Date expires		
Instruments		
1. (Upload) instruments (zip)		

Table [ SEQ Table \\* ARABIC ]: Notifications

Information	CFR and Guidance	Location & File: GSDT or CBI?
Certification	40 CFR 146.85(d)	
1. Received certified mail copy of notification		
2. Electronic notification submitted		
a. (Upload) file		
b. Supplemental material		
c. Comments		

Table [ SEQ Table \\* ARABIC ]: Complete Submission

Information	CFR and Guidance	Location & File: GSDT or CBI?
Validate Required Fields		
1. Required check for blank fields		
Authorized submission		
1. Must have completed an EPA Electronic Signature Agreement		
2. comments		
3. Submit means you agree to the certification.		